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12 *Attorneys for Plaintiff*
A&A Global Imports, Inc.

13
14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

16 A&A GLOBAL IMPORTS, INC.,
a California corporation,

17 Plaintiff,

18 vs.

19 CBJ DISTRIBUTING LLC d/b/a
20 CANNABIZ SUPPLY, a Nevada limited
liability company; THC LABEL
21 SOLUTIONS, a California company,

22 Defendants.

Case No.: 2:19-cv-02005-GMN-NJK

STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND DEFENDANT
CBJ DISTRIBUTING LLC d/b/a
CANNABIZ SUPPLY'S TIME TO
RESPOND TO COMPLAINT

(FOURTH REQUEST)

23
24 This Stipulation to Extend Time to Respond to Complaint is made by and between
25 Plaintiff A&A Global Imports, Inc. ("Plaintiff") and Defendant CBJ Distributing LLC d/b/a
26 Cannabiz Supply ("Defendant") through their respective counsel, in light of the following
27 facts:

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RECITALS

A. Plaintiff filed the Complaint (“Complaint”) against Defendants on or about November 19, 2019 (ECF No. 1).

B. Defendant was served with the Complaint on November 20, 2019 (ECF No. 6).

C. The parties agreed to extend Defendant’s time to respond to the Complaint through March 15, 2020 (ECF Nos. 14, 18, and 20), in order to give Defendant time to investigate Plaintiff’s claims and prepare a proper response, and for the parties to discuss a potential resolution of this matter.

D. There is good cause to grant the extension because the parties have made substantial progress towards a potential settlement. Specifically, the parties are in the process of memorializing their agreement in a long-form settlement agreement. Plaintiff has prepared a draft of the written agreement and Defendant is reviewing that draft and intends to provide edits and comments soon.

E. Accordingly, the parties request this extension so they may work to finalize the settlement while avoiding the expenditure of fees and costs, which may affect and hamper settlement efforts.

F. Pursuant to Local Rule IA 6-2 and Local Rule 7.1, Plaintiff and Defendant respectfully request that the Court extend Defendant’s time to respond to Plaintiff’s Complaint through April 15, 2020.

G. Counsel for the parties anticipated exchanging drafts of the settlement agreement prior to the previous extension expiring but due to unforeseen circumstances, including the outbreak of COVID-19, the parties did not do so and the prior extension expired before the parties were able to confer about the draft settlement and the need for further extensions. The parties respectfully submit this constitutes excusable neglect pursuant to Local Rule IA 6-1(a).

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STIPULATION

1 NOW, THEREFORE, Plaintiff and Defendant hereby stipulate and agree that Defendant
2 has up to and including April 15, 2020, to file a response to Plaintiff's Complaint.

3 IT IS SO STIPULATED.

4 Dated: this 24th day of March, 2020.

LEWIS ROCA
ROTHGERBER CHRISTIE LLP

6 /s/ Meng Zhong
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13 *Attorneys for Plaintiff*
A&A Global Imports, Inc

14 Dated: this 24th day of March, 2020.

Law Offices of Philip A. Kantor, P.C.

16 /s/ Philip Kantor
Philip A. Kantor
1781 Village Center Circle, Suite 120
Las Vegas, NV 89134

18 *Attorneys for Defendant*
19 *CBJ Distributing LLC d/b/a Cannabiz Supply*

20 **ORDER**

21 **IT IS SO ORDERED.**

22 
23 _____
United States Magistrate Judge

24 DATED March 25, 2020
25 _____
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